

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MARTIN LUTHER KING, JR.
COUNTY, et al.,

Plaintiffs,

vs.

SCOTT TURNER, in his official capacity
as Secretary of the U.S. Department of
Housing and Urban Development, et al.,

Defendants.

Case No. 2:25-cv-00814-BJR

DECLARATION OF TILLY CHANG

I, Tilly Chang, declare as follows:

1. I am a resident of the State of California. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to the matters set forth below.

2. I am currently the Executive Director of the San Francisco County Transportation Authority ("SFCTA"). I have served as Executive Director since 2013 and was the Deputy Director for Planning from 2003 to September 2013. Prior to working at the SFCTA, I worked at the World Bank, the Metropolitan Transportation Commission, and a wireless technology startup. I have an M.S. in Transportation from the Massachusetts Institute of Technology and a B.A. from the University of California, Berkeley.

3. SFCTA is a transportation agency whose mission is to make travel safer, healthier, and easier for all. SFCTA plans, funds, and delivers transportation projects to improve travel choices for residents, commuters, and visitors throughout San Francisco. SFCTA administers San Francisco's dedicated transportation sales tax and other voter-approved funding programs. SFCTA is also designated under State law as the County's congestion management agency. SFCTA develops the San Francisco Transportation Plan, the blueprint for countywide transportation policy and investment. SFCTA is a separate legal entity from the City and County of San Francisco.

1 4. As the Executive Director, I oversee SFCTA's administration of San Francisco's
2 transportation sales tax and other voter-approved funding programs. I also lead the agency's
3 congestion management functions, including developing the San Francisco Transportation Plan.

4 5. Pursuant to State law, the San Francisco Board of Supervisors has designated SFCTA
5 as the agency to act as the Treasure Island Mobility Management Agency ("TIMMA"). TIMMA is a
6 separate legal entity from SFCTA and from the City and County of San Francisco. It is a
7 transportation agency that is responsible for developing and implementing a comprehensive
8 transportation program for Treasure Island, defined also to include Yerba Buena Island. As Executive
9 Director of SFCTA, I am also the Executive Director of TIMMA.

10 6. San Francisco's economy is still recovering from the impacts of the COVID-19
11 pandemic, and this has impacted SFCTA's and TIMMA's funding sources. In particular, SFCTA's
12 funding sources, including sales tax revenue and revenue from other voter-approved programs, are still
13 below pre-pandemic levels.

14 7. SFCTA and TIMMA depend heavily on federal funds, including funding from the
15 Federal Highway Administration (FHWA) to provide critical transportation planning and
16 improvements.

17 8. SFCTA is currently relying on more than \$107 million in FHWA grants, of which
18 approximately \$10.4 million has been programmed but not yet been obligated.

19 9. For fiscal year 2025, SFCTA has budgeted for approximately \$31.2 million in FHWA
20 funding, which accounts for approximately 16.4% of SFCTA's annual budget for revenues. It
21 anticipates receiving approximately \$27.9 million in FHWA funding in FY2026.

22 10. For fiscal year 2025, TIMMA has budgeted for approximately \$200,000 in FHWA
23 funding, and anticipates receiving approximately \$3.1 million in FHWA funding in FY2026.

24 11. These FHWA funds pay for a variety of crucial projects and programs. For example,
25 SFCTA has a grant for more than \$79 million under Highway Bridge Program (HPB) and Rebuilding
26 American Infrastructure with Sustainability and Equity (RAISE) to replace seven seismically deficient
27 bridges and reinforce another bridge. SFCTA also has a \$360,000 grant under the Safe Streets and
28 Roads for All (SS4A) program to address pedestrian and cyclist safety challenges near fourteen

freeway ramp intersections covering San Francisco's southeastern neighborhoods. SFCTA also has a \$2 million Reconnecting Neighborhoods and Communities (RCN) Planning Grant to develop transportation and land use concept designs to advance a high-quality multimodal, mixed-use transit-oriented area to connect certain neighborhoods and to promote community stabilization. TIMMA has a \$3 million Ferry Boat Program earmark grant to make improvements at the Treasure Island Ferry Terminal, including construction of public restrooms and a bus shelter.

12. SFCTA anticipates receiving additional FHWA funding that has not yet been obligated. It applied for a RAISE grant earlier this year and plans to seek further FHWA funding in the future. It anticipates continuing to receive formula subgrants through state and regional entities and applying for additional discretionary competitive grants. SFCTA anticipates receiving grant amendments or agreements in the next several months and will need to sign them expeditiously to keep its federal funding flowing. TIMMA also anticipates applying for additional FHWA funding in the future.

13. My understanding is that FHWA has recently issued new terms and conditions for funding.

14. If SFCTA refuses the new conditions and is denied federal funding, SFCTA and its constituents—the millions of people who live in, visit, or commute to San Francisco—would suffer significant harm in the short- and long-term. So too with TIMMA. Loss of funds would have immediate and longer-term impacts on SFCTA's and TIMMA's budgets and planning, agreements with subrecipients and contractors, and disruption of ongoing projects. The uncertainty around future funding also impacts SFCTA's and TIMMA's ability to plan future work and projects, as there are no adequate alternative funding sources.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May 19, 2025 at San Francisco, California.



TILLY CHANG

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2025, I served a true and correct copy of the foregoing document on the following parties by the method(s) indicated below:

Brian C. Kipnis Annalisa L. Cravens Sarah L. Bishop Rebecca S. Cohen <i>Assistant United States Attorneys</i> Office of the United States Attorney 700 Stewart Street, Suite 5220 Seattle, WA 98101-1271 brian.kipnis@usdoj.gov annalisa.cravens@usdoj.gov sarah.bishop@usdoj.gov rebecca.cohen@usdoj.gov <i>Attorneys for Defendants Scott Turner, U.S. Dept. of Housing and Urban Development, Sean Duffy, U.S. Dept. of Transportation, Tariq Bokhari, the Federal Transit Administration, Gloria M. Shepherd, the Federal Highway Administration, Chris Rocheleau, the Federal Aviation Administration, Drew Feeley, the Federal Railroad Administration</i>	<input checked="" type="checkbox"/> CM/ECF E-service <input type="checkbox"/> Email <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Certified Mail / Return Receipt Requested <input type="checkbox"/> Hand delivery / Personal service
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I declare under penalty of perjury under the laws of the United States and the State of Washington that the foregoing is true and correct.

DATED this 21st day of May, 2025.

/s/ Gabriela DeGregorio

Gabriela DeGregorio
 Litigation Assistant
 Pacifica Law Group LLP

CERTIFICATE OF SERVICE

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